

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

ALPINE SECURITIES CORPORATION,

Defendant.

Civil No. 1:17-CV-04179-DLC

Honorable Judge Denise L. Cote  
Magistrate Judge Ronald L. Ellis

**DECLARATION OF MARANDA FRITZ IN SUPPORT OF ALPINE'S  
REQUEST FOR LEAVE TO SUBMIT FACTUAL EXHIBITS IN SUPPORT OF ITS  
MOTIONS FOR RECONSIDERATION**

I, Maranda E. Fritz, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

1. I am a resident of the State of New York and well over 18 years of age, and make the statements herein based on my personal knowledge.
2. I am legal counsel for Alpine Securities Corporation ("Alpine"), the above-named Defendant in its action against Plaintiff United States Securities and Exchange Commission ("SEC").
3. Pursuant to Local Rule 6.3, Alpine has filed Motions for Reconsideration and requested leave of Court to submit multiple factual exhibits in support of its Motions, including an expert declaration, additional sample Suspicious Activity Reports ("SARs"), deposition testimony, and a letter, dated May 20, 2015, providing Alpine's response to the Examination Findings of the SEC's Office of Compliance Inspections and Examinations ("OCIE"). The substance and basis for the request to submit each of these exhibits is set forth in the Alpine's

Memorandum of Law in Support of Alpine's Request for Leave to Submit Factual Exhibits in Support of its Motions for Reconsideration.

4. Attached hereto as **Exhibit A** is a true and correct copy of a declaration executed by Alpine's expert, Beverly E. Loew.

5. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from Alpine's Rule 30(b)(6) Deposition, conducted on March 13, 2018, with Christopher L. Frankel, CEO of Alpine, as Alpine's designee.

6. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from a "draft" of Leia Farmer's Deposition, conducted on April 19, 2018 (one day prior to this filing). A completed copy of Ms. Farmer's Deposition transcript is expected by Monday, April 23, 2018 and can be provided to the Court.

7. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from Randall Jones' Deposition, conducted on March 20, 2018.

8. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from Erin Green's Deposition, conducted on March 14, 2018.

9. Attached hereto as **Exhibits F through M** are slip sheets for additional sample SARs for the Court's consideration. True and correct copies of the sample SARs in Ex. F through M are being filed under seal pursuant to the Court's standing order, set forth in the Endorsed Letter dated November 1, 2017, Dkt. No. 53.

10. Attached hereto as **Exhibit N** is a true and correct copy of Alpine's letter, dated May 20, 2015, responding to OCIE's Report of Examination.

WHEREFORE, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 20th day of April, 2018.

/s / Maranda E. Fritz

Maranda E. Fritz